

Date	Added	Cu Accr. #	Code	Market	Work Order	Invoice ID	Amount
7/17/03	3216429	3237167	125	Loop Not Delvrd		5542	\$66.00
7/17/03	3237849	3218470	345	Loop Not Delvrd		5226	\$66.00
7/17/03	3237882	3237599	125	Loop Not Delvrd		5040	\$66.00
7/17/03	3237846		125	Loop Not Delvrd		5021	\$66.00
7/17/03	3233878		125	Loop Not Delvrd		5014	\$66.00
7/17/03	3233878		456	Loop Not Delvrd		7820	\$66.00
7/18/03	3231718		110	Loop Not Delvrd		5643	\$66.00
7/18/03	3233878		110	Loop Not Delvrd		6646	\$66.00
7/18/03	3238744		110	Loop Not Delvrd		4910	\$66.00
7/18/03	3238035		125	Loop Not Delvrd		4910	\$66.00
7/18/03	3237783		345	Loop Not Delvrd	BLANK	1999	\$66.00
7/18/03	3239095		125	Loop Not Delvrd		5044	\$66.00
7/18/03	3216958		125	Loop Not Delvrd		5252	\$66.00
7/18/03	3239299		345	Loop Not Delvrd		5395	\$66.00
7/18/03	3240383		125	Loop Not Delvrd		5622	\$66.00
7/18/03	3238748		115	Loop Not Delvrd		4908	\$66.00
7/18/03	3237630		125	Loop Not Delvrd		6547	\$66.00
7/18/03	3231718		110	Loop Not Delvrd		5643	\$66.00
7/18/03	3238744		110	Loop Not Delvrd		6547	\$66.00
7/18/03	3238589		110	Loop Not Delvrd		5104	\$66.00
7/18/03	3238215		110	Loop Not Delvrd		6548	\$66.00
7/18/03	3210287		110	Loop Not Delvrd		5990	\$66.00
7/18/03	3238797		115	Loop Not Delvrd		6017	\$66.00
7/18/03	3138900		115	Loop Not Delvrd		5015	\$66.00
7/18/03	3238242		125	Loop Not Delvrd		4202	\$66.00
7/18/03	3131924		120	Loop Not Delvrd		5981	\$66.00
7/18/03	3235149		115	Loop Not Delvrd		5982	\$66.00
7/18/03	3221801		115	Loop Not Delvrd		1583	\$66.00
7/18/03	3234514		125	Loop Not Delvrd		4936	\$66.00
7/18/03	3238513		125	Loop Not Delvrd		5046	\$66.00
7/18/03	3236242		110	Loop Not Delvrd		4015	\$66.00
7/18/03	3239566		120	Loop Not Delvrd		4235	\$66.00
7/18/03	3231990		120	Loop Not Delvrd		3717	\$66.00
7/18/03	3238704		110	Loop Not Delvrd		5917	\$66.00
7/18/03	3237985		115	Loop Not Delvrd		5916	\$66.00
7/18/03	3078968		115	Loop Not Delvrd		5396	\$66.00
7/18/03	3150525		125	Loop Not Delvrd		5918	\$66.00
7/18/03	3238840		115	Loop Not Delvrd		6189	\$66.00
7/18/03	3239553		110	Loop Not Delvrd		9	\$66.00
7/18/03	3239518		456	Loop Not Delvrd		4835	\$66.00
7/18/03	3155022		125	Loop Not Delvrd		5920	\$66.00
7/18/03	3232044		115	Loop Not Delvrd		5105	\$66.00
7/18/03	3238554		125	Loop Not Delvrd		5048	\$66.00
7/18/03	3238909		125	Loop Not Delvrd		6551	\$66.00
7/18/03	3239260		110	Loop Not Delvrd		5047	\$66.00
7/18/03	3240204		125	Loop Not Delvrd		5121	\$66.00
7/18/03	3239396		115	Loop Not Delvrd		5992	\$66.00
7/18/03	3238298		115	Loop Not Delvrd		6590	\$66.00
7/18/03	3238296		115	Loop Not Delvrd		6593	\$66.00
7/18/03	3239667		110	Loop Not Delvrd		3094	\$66.00
7/18/03	3240409		345	Loop Not Delvrd		5922	\$66.00
7/18/03	3239448		115	Loop Not Delvrd		5397	\$66.00
7/18/03	3239355		125	Loop Not Delvrd		5624	\$66.00
7/18/03	3238951		115	Loop Not Delvrd		5623	\$66.00
7/18/03	3236141		115	Loop Not Delvrd		6550	\$66.00
7/18/03	3239285		110	Loop Not Delvrd		8160	\$66.00
7/18/03	3239257		125	Loop Not Delvrd		5873	\$66.00
7/18/03	3238085		115	Loop Not Delvrd		5052	\$66.00
7/18/03	3239214		125	Loop Not Delvrd		5050	\$66.00
7/18/03	3239154		125	Loop Not Delvrd		3762	\$66.00
7/18/03	3239488		110	Loop Not Delvrd		5001	\$66.00
7/18/03	3215848		125	Loop Not Delvrd		MW512	\$66.00
7/18/03	3218028		125	Loop Not Delvrd		4888	\$66.00
7/18/03	3239272		125	Loop Not Delvrd		3096	\$66.00
7/18/03	3239946		345	Loop Not Delvrd		6193	\$66.00
7/18/03	3239360		110	Loop Not Delvrd		3764	\$66.00
7/18/03	3022937		110	Loop Not Delvrd	MW512		\$66.00
7/18/03	3238947		456	Loop Not Delvrd		5827	\$66.00
7/18/03	3135683		115	Loop Not Delvrd		5253	\$66.00
7/18/03	3232941		345	Loop Not Delvrd		5054	\$66.00
7/18/03	3239039		125	Loop Not Delvrd		5053	\$66.00
7/18/03	3238081		125	Loop Not Delvrd		5435	\$66.00
7/18/03	3240094		115	Loop Not Delvrd		5828	\$66.00
7/18/03	3238660		115	Loop Not Delvrd		5876	\$66.00
7/18/03	3228277		115	Loop Not Delvrd		5829	\$66.00
7/18/03	3238830		110	Loop Not Delvrd		3765	\$66.00
7/18/03	3162402		120	Loop Not Delvrd		4234	\$66.00
7/18/03	3238111		110	Loop Not Delvrd		6553	\$66.00
7/18/03	3237533		125	Loop Not Delvrd		5401	\$66.00

Date	Cu	Acct #	Market	Code	Billing Reason	Work Order Invoice ID	Bill Amount
7/24/03	32408973	110	Loop Not Delvrd	6625			\$66.00
7/24/03	3236883	110	Loop Not Delvrd	6624			\$66.00
7/24/03	3236605	110	Loop Not Delvrd	6195			\$66.00
7/28/03	3236559	115	Loop Not Delvrd	2151			\$66.00
7/28/03	3236868	125	Loop Not Delvrd	5403			\$66.00
7/28/03	3239337	125	Loop Not Delvrd	5089			\$66.00
7/28/03	3240241	120	Loop Not Delvrd	4089			\$66.00
7/28/03	3240483	115	Loop Not Delvrd	5984			\$66.00
7/28/03	3240403	115	Loop Not Delvrd	5985			\$66.00
7/28/03	3240773	125	Loop Not Delvrd	5079			\$66.00
7/28/03	3240429	125	Loop Not Delvrd	4098			\$66.00
7/28/03	3238317	110	Loop Not Delvrd	6555			\$66.00
7/28/03	3240562	115	Loop Not Delvrd	5832			\$66.00
7/28/03	3239784	110	Loop Not Delvrd	3951			\$66.00
7/28/03	3240581	115	Loop Not Delvrd	5835			\$66.00
7/28/03	3240171	125	Loop Not Delvrd	5437			\$66.00
7/28/03	3236863	110	Loop Not Delvrd	6199			\$66.00
7/28/03	3236711	125	Loop Not Delvrd	MWS16			\$66.00
7/28/03	3235942	125	Loop Not Delvrd	5405			\$66.00
7/28/03	3240802	110	Loop Not Delvrd	3742			\$66.00
7/28/03	3240191	125	Loop Not Delvrd	4928			\$66.00
7/28/03	3240174	125	Loop Not Delvrd	4929			\$66.00
7/28/03	3240884	125	Loop Not Delvrd	5406			\$66.00
7/29/03	3240365	125	Loop Not Delvrd	5091			\$66.00
7/29/03	3240091	125	Loop Not Delvrd	4911			\$66.00
7/29/03	3238612	115	Loop Not Delvrd	5807			\$66.00
7/29/03	3045346	115	Loop Not Delvrd	5838			\$66.00
7/29/03	3242363	110	Loop Not Delvrd	3767			\$66.00
7/29/03	3154928	120	Loop Not Delvrd	4231			\$66.00
7/29/03	3239708	125	Loop Not Delvrd	5407			\$66.00
7/29/03	3240894	110	Loop Not Delvrd	3723			\$66.00
7/29/03	3240138	110	Loop Not Delvrd	6203			\$66.00
7/29/03	3240306	566	Loop Not Delvrd	7910			\$66.00
7/29/03	3240619	125	Loop Not Delvrd	4208			\$66.00
7/29/03	3060089	125	Loop Not Delvrd	4912			\$66.00
7/29/03	3239203	485	Loop Not Delvrd	MWS17			\$66.00
7/29/03	3241700	345	Loop Not Delvrd	8179			\$66.00
7/29/03	3130620	125	Loop Not Delvrd	4217			\$66.00
7/29/03	3240729	125	Loop Not Delvrd	5435			\$66.00
7/29/03	3240480	125	Loop Not Delvrd	4931			\$66.00
7/29/03	3227385	120	Loop Not Delvrd	4102			\$66.00
7/29/03	3238423	345	Loop Not Delvrd	8172			\$66.00
7/29/03	3239291	110	Loop Not Delvrd	3768			\$66.00
7/29/03	3070812	115	Loop Not Delvrd	2153			\$66.00
7/30/03	3241697	120	Loop Not Delvrd	4019			\$66.00
7/30/03	3240958	115	Loop Not Delvrd	5987			\$66.00
7/30/03	3214208	110	Loop Not Delvrd	6630			\$66.00
7/30/03	3240800	125	Loop Not Delvrd	5438			\$66.00
7/30/03	3146324	120	Loop Not Delvrd	4103			\$66.00
7/30/03	3241219	115	Loop Not Delvrd	5609			\$66.00
7/30/03	3045528	115	Loop Not Delvrd	5878			\$66.00
7/30/03	3240952	115	Loop Not Delvrd	5612			\$66.00
7/30/03	3240599	125	Loop Not Delvrd	5244			\$66.00
7/30/03	3241976	120	Loop Not Delvrd	4208			\$66.00
7/30/03	3240819	115	Loop Not Delvrd	5989			\$66.00
7/30/03	3239781	110	Loop Not Delvrd	6556			\$66.00
7/30/03	3240747	125	Loop Not Delvrd	5245			\$66.00
7/30/03	3237911	110	Loop Not Delvrd	3724			\$66.00
7/30/03	3241387	125	Loop Not Delvrd	5229			\$66.00
7/30/03	3241150	115	Loop Not Delvrd	1892			\$66.00
7/30/03	3025065	120	Loop Not Delvrd	4210			\$66.00
7/30/03	3233711	110	Loop Not Delvrd	3769			\$66.00
7/30/03	3241543	125	Loop Not Delvrd	4308			\$66.00
7/30/03	3236988	110	Loop Not Delvrd	6557			\$66.00
7/30/03	3238173	125	Loop Not Delvrd	4932			\$66.00
7/30/03	3241237	115	Loop Not Delvrd	5879			\$66.00
7/30/03	3240722	115	Loop Not Delvrd	5880			\$66.00
7/30/03	3241129	120	Loop Not Delvrd	4106			\$66.00
7/30/03	3241072	125	Loop Not Delvrd	4930			\$66.00
7/30/03	3241301	125	Loop Not Delvrd	196975			\$66.00
7/30/03	3240205	110	Loop Not Delvrd	6631			\$66.00
7/30/03	3241826	110	Loop Not Delvrd	6632			\$66.00
7/30/03	3241245	110	Loop Not Delvrd	3770			\$66.00
7/30/03	3240805	120	Loop Not Delvrd	4307			\$66.00
7/30/03	3242337	110	Loop Not Delvrd	6553			\$66.00
7/30/03	3236846	125	Loop Not Delvrd	5057			\$66.00
7/31/03	3241025	125	Loop Not Delvrd	5230			\$66.00
7/31/03	3241831	115	Loop Not Delvrd	5617			\$66.00
7/31/03	3240758	345	Loop Not Delvrd	3047			\$66.00
7/31/03	3242606	120	Loop Not Delvrd	4107			\$66.00



Cavalier Telephone - FCC Arbitration  
C27 - Webb Testimony  
List of Loops Not Delivered and Missed Appointments

AW-4

August 2003

Date Added	Cu Acct #	Market Code	Billing Reason	Work Order Invoice ID	Bill Amount
8/4/03	3241705	345	Loop Not Delvrd	3050	\$66.00
8/4/03	3241988	345	Loop Not Delvrd	3051	\$66.00
8/4/03	3231142	120	Loop Not Delvrd	4109	\$66.00
8/4/03	3130435	115	Loop Not Delvrd	5883	\$66.00
8/4/03	3242014	345	Loop Not Delvrd	8186	\$66.00
8/4/03	3220555	115	Loop Not Delvrd	5850	\$66.00
8/4/03	3242262	115	Loop Not Delvrd	2170	\$66.00
8/4/03	3243060	115	Loop Not Delvrd	2171	\$66.00
8/4/03	3242595	115	Loop Not Delvrd	5619	\$66.00
8/4/03	3239531	120	Loop Not Delvrd	4113	\$66.00
8/4/03	3241128	345	Loop Not Delvrd	3100	\$66.00
8/4/03	3243062	125	Loop Not Delvrd	4961	\$66.00
8/4/03	3234947	120	Loop Not Delvrd	4111	\$66.00
8/4/03	3241923	566	Loop Not Delvrd	7912	\$66.00
8/5/03	3234870	125	Loop Not Delvrd	4960	\$66.00
8/5/03	2000234	120	Loop Not Delvrd	4022	\$66.00
8/5/03	3243198	125	Loop Not Delvrd	5253	\$66.00
8/5/03	3055898	115	Loop Not Delvrd	5504	\$66.00
8/5/03	3242226	345	Loop Not Delvrd	3053	\$66.00
8/5/03	3243611	115	Loop Not Delvrd	5852	\$66.00
8/5/03	1017053	345	Loop Not Delvrd	7028	\$66.00
8/5/03	3236791	345	Loop Not Delvrd	8188	\$66.00
8/5/03	3206300	115	Loop Not Delvrd	5853	\$66.00
8/5/03	3049789	115	Loop Not Delvrd	5622	\$66.00
8/5/03	3135918	115	Loop Not Delvrd	5621	\$66.00
8/5/03	3204699	345	Loop Not Delvrd	8190	\$66.00
8/5/03	3238518	345	Loop Not Delvrd	8189	\$66.00
8/5/03	3240091	125	Loop Not Delvrd	4957	\$66.00
8/5/03	3242323	345	Loop Not Delvrd	7002	\$66.00
8/5/03	3241747	125	Loop Not Delvrd	4563	\$66.00
8/5/03	3242626	125	Loop Not Delvrd	5418	\$66.00
8/5/03	3219863	345	Loop Not Delvrd	8148	\$66.00
8/5/03	3243248	115	Loop Not Delvrd	5493	\$66.00
8/5/03	3080647	110	Loop Not Delvrd	6563	\$66.00
8/6/03	3242047	455	Loop Not Delvrd	7722	\$66.00
8/6/03	3241725	125	Loop Not Delvrd	5254	\$66.00
8/6/03	3242798	345	Loop Not Delvrd	8191	\$66.00
8/6/03	3243786	125	Loop Not Delvrd	5227	\$66.00
8/6/03	3243384	125	Loop Not Delvrd	5420	\$66.00
8/6/03	3242199	345	Loop Not Delvrd	7029	\$66.00
8/6/03	3242577	345	Loop Not Delvrd	7135	\$66.00
8/6/03	3242577	345	Loop Not Delvrd	7026	\$66.00
8/6/03	3134892	345	Loop Not Delvrd	PAUL	\$66.00
8/6/03	1002454	345	Loop Not Delvrd	7137	\$66.00
8/6/03	3243800	125	Loop Not Delvrd	5422	\$66.00
8/6/03	1016918	345	Loop Not Delvrd	7136	\$66.00
8/6/03	3241131	125	Loop Not Delvrd	5413	\$66.00
8/6/03	3243294	455	Loop Not Delvrd	7724	\$66.00
8/7/03	1056709	125	Loop Not Delvrd	4948	\$66.00
8/7/03	3194913	125	Loop Not Delvrd	5029	\$66.00
8/7/03	3239588	110	Loop Not Delvrd	6649	\$66.00
8/7/03	3239222	345	Loop Not Delvrd	3058	\$66.00
8/7/03	3242955	345	Loop Not Delvrd	8161	\$66.00
8/7/03	3242882	345	Loop Not Delvrd	7165	\$66.00
8/7/03	3241101	345	Loop Not Delvrd	7005	\$66.00

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List of Loops Not Delivered and Missed Appointments

AW-4

August 2003

Date Added	Cu Acct #	Market Code	Billing Reason	Work Order Invoice ID	Bill Amount
8/4/03	3241705	345	Loop Not Delvrd	3050	\$66.00
8/4/03	3241988	345	Loop Not Delvrd	3051	\$66.00
8/4/03	3231142	120	Loop Not Delvrd	4109	\$66.00
8/4/03	3130435	115	Loop Not Delvrd	5883	\$66.00
8/4/03	3242014	345	Loop Not Delvrd	8186	\$66.00
8/4/03	3220555	115	Loop Not Delvrd	5850	\$66.00
8/4/03	3242262	115	Loop Not Delvrd	2170	\$66.00
8/4/03	3243060	115	Loop Not Delvrd	2171	\$66.00
8/4/03	3242595	115	Loop Not Delvrd	5619	\$66.00
8/4/03	3239531	120	Loop Not Delvrd	4113	\$66.00
8/4/03	3241128	345	Loop Not Delvrd	3100	\$66.00
8/4/03	3243062	125	Loop Not Delvrd	4961	\$66.00
8/4/03	3234947	120	Loop Not Delvrd	4111	\$66.00
8/4/03	3241923	566	Loop Not Delvrd	7912	\$66.00
8/5/03	3234870	125	Loop Not Delvrd	4960	\$66.00
8/5/03	2000234	120	Loop Not Delvrd	4022	\$66.00
8/5/03	3243198	125	Loop Not Delvrd	5253	\$66.00
8/5/03	3055898	115	Loop Not Delvrd	5504	\$66.00
8/5/03	3242226	345	Loop Not Delvrd	3053	\$66.00
8/5/03	3243611	115	Loop Not Delvrd	5852	\$66.00
8/5/03	1017053	345	Loop Not Delvrd	7028	\$66.00
8/5/03	3236791	345	Loop Not Delvrd	8188	\$66.00
8/5/03	3206300	115	Loop Not Delvrd	5853	\$66.00
8/5/03	3049789	115	Loop Not Delvrd	5622	\$66.00
8/5/03	3135918	115	Loop Not Delvrd	5621	\$66.00
8/5/03	3204699	345	Loop Not Delvrd	8190	\$66.00
8/5/03	3238518	345	Loop Not Delvrd	8189	\$66.00
8/5/03	3240091	125	Loop Not Delvrd	4957	\$66.00
8/5/03	3242323	345	Loop Not Delvrd	7002	\$66.00
8/5/03	3241747	125	Loop Not Delvrd	4563	\$66.00
8/5/03	3242626	125	Loop Not Delvrd	5418	\$66.00
8/5/03	3219863	345	Loop Not Delvrd	8148	\$66.00
8/5/03	3243248	115	Loop Not Delvrd	5493	\$66.00
8/5/03	3080647	110	Loop Not Delvrd	6563	\$66.00
8/6/03	3242047	455	Loop Not Delvrd	7722	\$66.00
8/6/03	3241725	125	Loop Not Delvrd	5254	\$66.00
8/6/03	3242798	345	Loop Not Delvrd	8191	\$66.00
8/6/03	3243786	125	Loop Not Delvrd	5227	\$66.00
8/6/03	3243384	125	Loop Not Delvrd	5420	\$66.00
8/6/03	3242199	345	Loop Not Delvrd	7029	\$66.00
8/6/03	3242577	345	Loop Not Delvrd	7135	\$66.00
8/6/03	3242577	345	Loop Not Delvrd	7026	\$66.00
8/6/03	3134892	345	Loop Not Delvrd	PAUL	\$66.00
8/6/03	1002454	345	Loop Not Delvrd	7137	\$66.00
8/6/03	3243800	125	Loop Not Delvrd	5422	\$66.00
8/6/03	1016918	345	Loop Not Delvrd	7136	\$66.00
8/6/03	3241131	125	Loop Not Delvrd	5413	\$66.00
8/6/03	3243294	455	Loop Not Delvrd	7724	\$66.00
8/7/03	1056709	125	Loop Not Delvrd	4948	\$66.00
8/7/03	3194913	125	Loop Not Delvrd	5029	\$66.00
8/7/03	3239588	110	Loop Not Delvrd	6649	\$66.00
8/7/03	3239222	345	Loop Not Delvrd	3058	\$66.00
8/7/03	3242955	345	Loop Not Delvrd	8161	\$66.00
8/7/03	3242882	345	Loop Not Delvrd	7165	\$66.00
8/7/03	3241101	345	Loop Not Delvrd	7005	\$66.00

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Date Added	Cu Acct #	Market Code	Billing Reason	Work Order	Bill Amount
				Invoice ID	
8/7/03	3241650	345	Loop Not Delvrd	7006	\$66.00
8/7/03	3240612	345	Loop Not Delvrd	8162	\$66.00
8/7/03	3241179	125	Loop Not Delvrd	5443	\$66.00
8/7/03	3241179	125	Loop Not Delvrd	5443	\$66.00
8/7/03	3240116	345	Loop Not Delvrd	8193	\$66.00
8/7/03	3026627	115	Loop Not Delvrd	5783	\$66.00
8/7/03	3233917	125	Loop Not Delvrd	4950	\$66.00
8/7/03	3241554	345	Loop Not Delvrd	7727	\$66.00
8/7/03	3243593	120	Loop Not Delvrd	7022	\$66.00
8/7/03	3236910	110	Loop Not Delvrd	6639	\$66.00
8/11/03	3244159	345	Loop Not Delvrd	7023	\$66.00
8/11/03	3244198	345	Loop Not Delvrd	7729	\$66.00
8/11/03	3242137	125	Loop Not Delvrd	5085	\$66.00
8/11/03	3243670	120	Loop Not Delvrd	4312	\$66.00
8/11/03	3243574	345	Loop Not Delvrd	3064	\$66.00
8/11/03	3151067	125	Loop Not Delvrd	5088	\$66.00
8/11/03	3016764	110	Loop Not Delvrd	9103	\$66.00
8/11/03	3234068	345	Loop Not Delvrd	8194	\$66.00
8/11/03	3157645	345	Loop Not Delvrd	8168	\$66.00
8/11/03	3244075	125	Loop Not Delvrd	5032	\$66.00
8/11/03	3240748	125	Loop Not Delvrd	5093	\$264.00
8/12/03	3244251	345	Loop Not Delvrd	7832	\$66.00
8/12/03	3230382	115	Loop Not Delvrd	6015	\$66.00
8/12/03	3238515	345	Loop Not Delvrd	7033	\$66.00
8/12/03	3236791	345	Loop Not Delvrd	7226	\$66.00
8/13/03	3242990	566	Loop Not Delvrd	7908	\$66.00
8/13/03	3239198	115	Loop Not Delvrd	5859	\$66.00
8/13/03	3066968	125	Loop Not Delvrd	4374	\$66.00
8/13/03	3244274	345	Loop Not Delvrd	7833	\$66.00
8/13/03	3244349	120	Loop Not Delvrd	4121	\$66.00
8/13/03	3042368	110	Loop Not Delvrd	6607	\$66.00
8/13/03	3242169	345	Loop Not Delvrd	7034	\$66.00
8/13/03	3244260	345	Loop Not Delvrd	7035	\$66.00
8/13/03	3241260	345	Loop Not Delvrd	8191	\$66.00
8/13/03	3092964	115	Loop Not Delvrd	6014	\$66.00
8/13/03	3207723	110	Loop Not Delvrd	8784	\$66.00
8/13/03	3241485	120	Loop Not Delvrd	4223	\$66.00
8/13/03	3242621	115	Loop Not Delvrd	5788	\$66.00
8/13/03	3243691	115	Loop Not Delvrd	5988	\$66.00
8/13/03	3244309	345	Loop Not Delvrd	7139	\$66.00
8/13/03	3244429	345	Loop Not Delvrd	3835	\$66.00
8/13/03	3239144	345	Loop Not Delvrd	7037	\$66.00
8/14/03	3243986	455	Loop Not Delvrd	7608	\$66.00
8/14/03	3243984	455	Loop Not Delvrd	7309	\$66.00
8/14/03	3230575	120	Loop Not Delvrd	6717	\$66.00
8/14/03	3239805	110	Loop Not Delvrd	6608	\$66.00
8/14/03	3243680	115	Loop Not Delvrd	5863	\$66.00
8/14/03	3243082	120	Loop Not Delvrd	4126	\$66.00
8/14/03	3151067	125	Loop Not Delvrd	5108	\$66.00
8/14/03	3112244	120	Loop Not Delvrd	4320	\$66.00
8/14/03	3233757	125	Loop Not Delvrd	5153	\$66.00
8/14/03	3120914	125	Loop Not Delvrd	5447	\$66.00
8/14/03	3244229	110	Loop Not Delvrd	6609	\$66.00
8/14/03	3181396	125	Loop Not Delvrd	5095	\$66.00
8/14/03	3241038	345	Loop Not Delvrd	7142	\$66.00
8/14/03	3197285	345	Loop Not Delvrd	3068	\$66.00
8/14/03	3244615	125	Loop Not Delvrd	5107	\$66.00
8/14/03	3241604	125	Loop Not Delvrd	5154	\$66.00
8/14/03	3244150	455	Loop Not Delvrd	bdf0071	\$66.00
8/14/03	3136393	345	Loop Not Delvrd	7733	\$66.00

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Date Added	Cu Acct #	Market Code	Billing Reason	Work Order	
				Invoice ID	Bill Amount
8/14/03	3200295	125	Loop Not Delvrd	5096	\$66.00
8/14/03	3242621	115	Loop Not Delvrd	6035	\$66.00
8/14/03	3243387	345	Loop Not Delvrd	3069	\$66.00
8/14/03	3209102	110	Loop Not Delvrd	3781	\$66.00
8/14/03	3201883	345	Loop Not Delvrd	3070	\$66.00
8/14/03	3232025	455	Loop Not Delvrd	73	\$66.00
8/18/03	3244963	345	Loop Not Delvrd	7735	\$66.00
8/18/03	3243634	345	Loop Not Delvrd	7143	\$66.00
8/18/03	3232336	345	Loop Not Delvrd	8199	\$66.00
8/18/03	3245904	115	Loop Not Delvrd	5655	\$66.00
8/18/03	3243634	345	Loop Not Delvrd	7143	\$66.00
8/18/03	3244907	345	Loop Not Delvrd	7144	\$66.00
8/18/03	3244490	345	Loop Not Delvrd	8200	\$66.00
8/18/03	3246523	110	Loop Not Delvrd	3537	\$66.00
8/18/03	3244581	125	Loop Not Delvrd	5170	\$66.00
8/19/03	3025544	115	Loop Not Delvrd	5658	\$66.00
8/19/03	3242990	566	Loop Not Delvrd	7913	\$66.00
8/19/03	3028844	115	Loop Not Delvrd	5656	\$66.00
8/19/03	3109531	345	Loop Not Delvrd	7040	\$66.00
8/19/03	3239452	566	Loop Not Delvrd	2962	\$66.00
8/19/03	3233917	125	Loop Not Delvrd	4378	\$66.00
8/19/03	3244062	345	Loop Not Delvrd	8201	\$66.00
8/19/03	3243288	125	Loop Not Delvrd	5099	\$66.00
8/19/03	3149559	115	Loop Not Delvrd	6001	\$66.00
8/19/03	3244730	110	Loop Not Delvrd	6614	\$66.00
8/19/03	3245553	115	Loop Not Delvrd	5659	\$66.00
8/19/03	3238506	120	Loop Not Delvrd	4321	\$66.00
8/19/03	3244489	125	Loop Not Delvrd	5115	\$66.00
8/19/03	3201883	345	Loop Not Delvrd	3074	\$66.00
8/19/03	3187513	455	Loop Not Delvrd	bdf0081	\$162.00
8/19/03	3233811	110	Loop Not Delvrd	9160	\$66.00
8/19/03	1047424	455	Loop Not Delvrd	bdf0080	\$66.00
8/19/03	3239354	110	Loop Not Delvrd	3881	\$66.00
8/19/03	3243599	345	Loop Not Delvrd	2961	\$66.00
8/20/03	3245124	110	Loop Not Delvrd	6615	\$66.00
8/20/03	3245048	115	Loop Not Delvrd	5496	\$66.00
8/20/03	3131290	125	Loop Not Delvrd	5082	\$66.00
8/20/03	3246255	125	Loop Not Delvrd	4369	\$66.00
8/20/03	3246191	120	Loop Not Delvrd	4323	\$66.00
8/20/03	3170494	120	Loop Not Delvrd	4773	\$66.00
8/20/03	3128539	345	Loop Not Delvrd	7042	\$66.00
8/20/03	3245124	110	Loop Not Delvrd	6615	\$66.00
8/20/03	3246016	110	Loop Not Delvrd	9120	\$66.00
8/20/03	3246626	110	Loop Not Delvrd	9162	\$66.00
8/20/03	3244627	110	Loop Not Delvrd	3882	\$66.00
8/20/03	3247441	125	Loop Not Delvrd	5117	\$66.00
8/20/03	3241489	125	Loop Not Delvrd	4367	\$66.00
8/20/03	3245163	110	Loop Not Delvrd	9163	\$66.00
8/20/03	3244926	115	Loop Not Delvrd	5792	\$66.00
8/20/03	1013516	455	Loop Not Delvrd	82	\$66.00
8/20/03	3245143	115	Loop Not Delvrd	5497	\$66.00
8/20/03	3245345	345	Loop Not Delvrd	7145	\$66.00
8/20/03	3244008	125	Loop Not Delvrd	4946	\$66.00
8/20/03	3245072	115	Loop Not Delvrd	5870	\$66.00
8/20/03	3245058	345	Loop Not Delvrd	7043	\$66.00
8/20/03	3214572	115	Loop Not Delvrd	5868	\$66.00
8/20/03	3243515	125	Loop Not Delvrd	5158	\$66.00
8/20/03	3242621	115	Loop Not Delvrd	5646	\$66.00
8/20/03	3234181	125	Loop Not Delvrd	5268	\$66.00
8/20/03	3240741	455	Loop Not Delvrd	84	\$66.00

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Date Added	Cu Acct #	Market Code	Billing Reason	Work Order Invoice ID	Bill Amount
8/20/03	3243999	455	Loop Not Delvrd	7618	\$66.00
8/20/03	3243999	455	Loop Not Delvrd	7619	\$66.00
8/20/03	3168269	455	Loop Not Delvrd	7617	\$66.00
8/21/03	3246832	120	Loop Not Delvrd	4249	\$66.00
8/21/03	3241089	345	Loop Not Delvrd	8135	\$66.00
8/21/03	3244809	345	Loop Not Delvrd	8136	\$66.00
8/21/03	3230575	120	Loop Not Delvrd	4251	\$66.00
8/21/03	3132188	125	Loop Not Delvrd	1916	\$66.00
8/21/03	3244287	125	Loop Not Delvrd	4963	\$66.00
8/21/03	3239236	120	Loop Not Delvrd	4225	\$66.00
8/21/03	3246252	115	Loop Not Delvrd	5500	\$66.00
8/21/03	3245408	125	Loop Not Delvrd	5164	\$66.00
8/21/03	3137398	120	Loop Not Delvrd	4031	\$66.00
8/21/03	3246488	120	Loop Not Delvrd	4252	\$66.00
8/21/03	3244699	125	Loop Not Delvrd	5165	\$66.00
8/21/03	3235836	125	Loop Not Delvrd	4964	\$66.00
8/21/03	3132247	125	Loop Not Delvrd	5163	\$66.00
8/21/03	3201008	115	Loop Not Delvrd	5661	\$66.00
8/21/03	3246005	345	Loop Not Delvrd	7147	\$66.00
8/21/03	3246988	110	Loop Not Delvrd	3885	\$66.00
8/21/03	3247451	125	Loop Not Delvrd	bdf0085	\$66.00
8/21/03	3244718	125	Loop Not Delvrd	5160	\$66.00
8/25/03	3103450	115	Loop Not Delvrd	7353	\$66.00
8/25/03	3246668	115	Loop Not Delvrd	5665	\$66.00
8/25/03	3218199	345	Loop Not Delvrd	7741	\$66.00
8/25/03	3245997	345	Loop Not Delvrd	7068	\$66.00
8/25/03	3245374	345	Loop Not Delvrd	7067	\$66.00
8/25/03	3244901	345	Loop Not Delvrd	7049	\$66.00
8/25/03	3245165	115	Loop Not Delvrd	5520	\$66.00
8/25/03	3245201	345	Loop Not Delvrd	7069	\$66.00
8/25/03	3237765	566	Loop Not Delvrd	7190	\$66.00
8/25/03	3244489	125	Loop Not Delvrd	5122	\$66.00
8/25/03	3246931	455	Loop Not Delvrd	7742	\$66.00
8/25/03	3245553	115	Loop Not Delvrd	5664	\$66.00
8/25/03	3246464	345	Loop Not Delvrd	7071	\$66.00
8/25/03	3245193	345	Loop Not Delvrd	7070	\$66.00
8/25/03	3246003	345	Loop Not Delvrd	7149	\$66.00
8/25/03	3183226	125	Loop Not Delvrd	209143	\$66.00
8/25/03	3239236	120	Loop Not Delvrd	4227	\$66.00
8/25/03	3239236	110	Loop Not Delvrd	4226	\$66.00
8/25/03	3244863	345	Loop Not Delvrd	7050	\$66.00
8/25/03	3245627	345	Loop Not Delvrd	7051	\$66.00
8/25/03	3246660	115	Loop Not Delvrd	5663	\$66.00
8/25/03	3242621	115	Loop Not Delvrd	5720	\$66.00
8/25/03	3245250	----	Loop Not Delvrd	7150	\$66.00
8/25/03	3096048	120	Loop Not Delvrd	4327	\$66.00
8/25/03	3246940	125	Loop Not Delvrd	2	\$66.00
8/25/03	3246145	125	Loop Not Delvrd	5167	\$66.00
8/25/03	3246355	125	Loop Not Delvrd	4971	\$66.00
8/25/03	3243288	125	Loop Not Delvrd	208744	\$66.00
8/25/03	3244063	110	Loop Not Delvrd	9118	\$66.00
8/25/03	3241588	125	Loop Not Delvrd	5268	\$66.00
8/25/03	3247595	110	Loop Not Delvrd	8787	\$66.00
8/25/03	3242798	345	Loop Not Delvrd	3841	\$66.00
8/25/03	3245562	345	Loop Not Delvrd	3844	\$66.00
8/26/03	3015702	110	Loop Not Delvrd	8817	\$66.00
8/26/03	3053690	110	Loop Not Delvrd	8818	\$66.00
8/26/03	3192867	110	Loop Not Delvrd	9146	\$66.00
8/26/03	3247172	125	Loop Not Delvrd	5124	\$66.00
8/26/03	3246806	110	Loop Not Delvrd	3788	\$66.00



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Date Added	Cu Acct #	Market Code	Billing Reason	Work Order	
				Invoice ID	Bill Amount
8/26/03	3032030	110	Loop Not Delvrd	9147	\$66.00
8/26/03	3245628	566	Loop Not Delvrd	7913	\$66.00
8/26/03	3191582	110	Loop Not Delvrd	3740	\$66.00
8/26/03	3190079	125	Loop Not Delvrd	5270	\$66.00
8/26/03	3245454	455	Loop Not Delvrd	6784	\$46.00
8/26/03	3138580	115	Loop Not Delvrd	5650	\$66.00
8/26/03	3029953	120	Loop Not Delvrd	4328	\$66.00
8/26/03	3244577	110	Loop Not Delvrd	9170	\$66.00
8/26/03	3246014	110	Loop Not Delvrd	9169	\$66.00
8/26/03	3245718	110	Loop Not Delvrd	9148	\$66.00
8/26/03	3246966	125	Loop Not Delvrd	5201	\$66.00
8/26/03	3244632	110	Loop Not Delvrd	3740	\$66.00
8/26/03	3245986	115	Loop Not Delvrd	5521	\$66.00
8/26/03	3248333	345	Loop Not Delvrd	7216	\$66.00
8/26/03	3244309	345	Loop Not Delvrd	7151	\$66.00
8/26/03	3245898	115	Loop Not Delvrd	5761	\$66.00
8/26/03	3163811	345	Loop Not Delvrd	3842	\$66.00
8/26/03	1045178	345	Loop Not Delvrd	3843	\$66.00
8/26/03	3244936	125	Loop Not Delvrd	206657	\$66.00
8/26/03	3241325	110	Loop Not Delvrd	9150	\$66.00
8/26/03	3244357	125	Loop Not Delvrd	5271	\$66.00
8/26/03	3245726	110	Loop Not Delvrd	3789	\$66.00
8/26/03	3237357	115	Loop Not Delvrd	5763	\$66.00
8/26/03	3247767	115	Loop Not Delvrd	5762	\$66.00
8/26/03	3244630	125	Loop Not Delvrd	5125	\$66.00
8/26/03	3243714	125	Loop Not Delvrd	207375	\$66.00
8/26/03	3095364	125	Loop Not Delvrd	208632	\$66.00
8/26/03	3247690	110	Loop Not Delvrd	9151	\$66.00
8/27/03	3247761	125	Loop Not Delvrd	4389	\$66.00
8/27/03	3246963	125	Loop Not Delvrd	5126	\$66.00
8/27/03	3241604	125	Loop Not Delvrd	5174	\$66.00
8/27/03	3147873	125	Loop Not Delvrd	208623	\$66.00
8/27/03	3076871	120	Loop Not Delvrd	4035	\$66.00
8/27/03	3246361	125	Loop Not Delvrd	5199	\$66.00
8/27/03	3246496	115	Loop Not Delvrd	7308	\$66.00
8/27/03	3247143	125	Loop Not Delvrd	5200	\$66.00
8/27/03	3134452	115	Loop Not Delvrd	5721	\$66.00
8/27/03	3244351	125	Loop Not Delvrd	5175	\$66.00
8/27/03	3082154	115	Loop Not Delvrd	7309	\$66.00
8/27/03	3248140	115	Loop Not Delvrd	5523	\$66.00
8/27/03	3248140	115	Loop Not Delvrd	5524	\$66.00
8/27/03	3242271	115	Loop Not Delvrd	7310	\$66.00
8/27/03	3245678	566	Loop Not Delvrd	7193	\$66.00
8/27/03	3245163	110	Loop Not Delvrd	9171	\$66.00
8/27/03	3242376	115	Loop Not Delvrd	5222	\$66.00
8/27/03	32469057	345	Loop Not Delvrd	7624	\$66.00
8/27/03	3246270	345	Loop Not Delvrd	7077	\$66.00
8/27/03	3213178	120	Loop Not Delvrd	4330	\$66.00
8/27/03	3246396	110	Loop Not Delvrd	9154	\$66.00
8/27/03	3111015	125	Loop Not Delvrd	5182	\$66.00
8/27/03	3246877	115	Loop Not Delvrd	5525	\$66.00
8/27/03	3247820	455	Loop Not Delvrd	7837	\$66.00
8/27/03	3006804	110	Loop Not Delvrd	3791	\$66.00
8/27/03	3246867	125	Loop Not Delvrd	5272	\$66.00
8/27/03	3246223	345	Loop Not Delvrd	7078	\$66.00
8/27/03	3246662	345	Loop Not Delvrd	7079	\$66.00
8/27/03	3243664	110	Loop Not Delvrd	8820	\$66.00
8/27/03	3245587	125	Loop Not Delvrd	5127	\$66.00
8/27/03	3245512	125	Loop Not Delvrd	5128	\$66.00
8/27/03	3244402	125	Loop Not Delvrd	4392	\$66.00

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Date Added	Cu Acct #	Market Code	Billing Reason	Work Order Invoice ID	Bill Amount
8/28/03	3098611	115	Loop Not Delvrd	5766	\$66.00
8/28/03	3248525	110	Loop Not Delvrd	4256	\$66.00
8/28/03	3247458	110	Loop Not Delvrd	4261	\$66.00
8/28/03	3248236	345	Loop Not Delvrd	7052	\$66.00
8/28/03	3240364	120	Loop Not Delvrd	4375	\$66.00
8/28/03	3241343	345	Loop Not Delvrd	7011	\$66.00
8/28/03	3122671	125	Loop Not Delvrd	5189	\$66.00
8/28/03	3241489	125	Loop Not Delvrd	9714	\$66.00
8/28/03	3235263	120	Loop Not Delvrd	4376	\$66.00
8/28/03	3248241	125	Loop Not Delvrd	210386	\$66.00
8/28/03	3246542	115	Loop Not Delvrd	1385	\$66.00
8/28/03	3248857	125	Loop Not Delvrd	Layne	\$66.00
8/28/03	3246911	566	Loop Not Delvrd	7914	\$66.00
8/28/03	3247446	115	Loop Not Delvrd	5066	\$66.00
8/28/03	3247286	125	Loop Not Delvrd	5129	\$66.00
8/28/03	3245895	125	Loop Not Delvrd	5177	\$66.00
8/28/03	3229950	125	Loop Not Delvrd	5191	\$66.00
8/28/03	3245986	115	Loop Not Delvrd	5526	\$66.00
8/28/03	3243649	120	Loop Not Delvrd	Mike	\$66.00
8/28/03	3247905	120	Loop Not Delvrd	4036	\$66.00
8/28/03	3248837	345	Loop Not Delvrd	7053	\$66.00
8/28/03	3238424	345	Loop Not Delvrd	7156	\$66.00
8/28/03	3246343	345	Loop Not Delvrd	7155	\$66.00
8/28/03	3096048	120	Loop Not Delvrd	4037	\$66.00
8/28/03	3244147	455	Loop Not Delvrd	6781	\$66.00
8/6/03	3071957	125	Repeat Disp / Other	4373	\$66.00
8/7/03	3229396	110	Repeat Disp / Other	6604	\$94.00
8/18/03	3207723	110	Repeat Disp / Other	3736	\$66.00
8/20/03	1002228	455	Repeat Disp / Other	82	\$66.00
8/25/03	3245297	115	Repeat Disp / Other	5758	\$66.00
8/25/03	3119892	125	Repeat Disp / Other	5521	\$66.00
8/25/03	3233917	125	Repeat Disp / Other	4970	\$66.00
8/26/03	3019127	110	Repeat Disp / Other	3886	\$66.00
8/28/03	3225893	125	Repeat Disp / Other	5130	\$66.00
8/7/03	3239128	345	VMeet - Late	7025	\$66.00
8/21/03	3242665	345	VMeet - Late	7146	\$82.00
8/4/03	3002971	110	VMeet - Missed	5959	\$82.00
8/20/03	3023306	110	VMeet - Missed	9161	\$66.00
8/20/03	3236791	345	VMeet - Missed	7168	\$66.00
8/25/03	3161946	110	VMeet - Missed	9165	\$66.00
8/25/03	3133614	110	VMeet - Missed	9166	\$66.00
8/26/03	3134408	125	VMeet - Missed	5172	\$66.00
8/5/03	3215848	125	VMeet - Repaired	5027	\$66.00
8/5/03	3193022	345	VMeet - Repaired	8159	\$66.00
8/19/03	3232336	345	VMeet - Repaired	7166	\$66.00
8/20/03	3163131	125	VMeet - Repaired	5116	\$66.00
8/21/03	1002228	455	VMeet - Repaired	7620	\$66.00
8/21/03	3242169	345	VMeet - Repaired	7045	\$66.00
8/27/03	3019127	110	VMeet - Repaired	8204	\$82.00
8/28/03	1049879	455	VMeet - Repaired	7625	\$66.00

Total: \$23,120.00


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#### Subject: Charges Related to UNE Loops

Consistent with its tariffs and interconnection agreements in various states, Verizon may charge a CLEC customer purchasing a UNE Loop when Verizon has dispatched a technician (a "Dispatch" charge), when the CLEC has requested and Verizon has provided an expedited service (an "Expedite" charge), or when Verizon has dispatched a technician, but the installation was not completed by the technician for a reason relating to the CLEC or its customer (a "TC Not Ready" charge).

As a result of an oversight, Verizon did not bill CLECs for these services from 2000 through the present in certain states. Dispatch charges should have been billed, but were not billed in CT, MA, ME, NY, and VT. Expedite charges should have been billed, but were not billed in CT, MA, ME, MD, NH, NJ, NY, RI, and VT. TC Not Ready charges should have been billed, but were not billed in CT, DE, MA, MD, ME, NH, NJ, NY, RI, and VT. Verizon has begun to bill new Dispatch and TC Not Ready charges on an automated basis as of August 16, 2003. Verizon will start billing new Expedite charges on an automated basis during the fourth quarter of 2003.

In addition, beginning in September 2003, Verizon will manually backbill CLECs for Dispatch, Expedite, and TC Not Ready charges for the period beginning when Verizon was authorized to bill these charges in each jurisdiction (in or after August 2000) and ending at the commencement of automated billing. Documentation will be provided detailing each charge with the service order number, purchase order number, class of service, billing telephone number, the application date, due date, and the completion date of the service order. A sample report is attached.

If you have any questions, please contact your Verizon Carrier Services Account Representative.

[Sample Report](#)

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Petition of Cavalier Telephone, LLC	)	WC Docket No. 02-359
Pursuant to Section 252(e)(5) of the	)	
Communications Act for Preemption	)	
of the Jurisdiction of the Virginia State	)	
Corporation Commission Regarding	)	
Interconnection Disputes with Verizon	)	
Virginia, Inc. and for Arbitration	)	

**TESTIMONY OF MARK ZITZ  
ON BEHALF OF CAVALIER TELEPHONE, LLC**

**CAVALIER EXHIBIT \_\_\_\_**

September 23, 2003

1 **Q. Please state your name, business address, responsibilities and professional**  
2 **background.**

3 A. My name is Mark Zitz and my business address is 18 Shea Way, Newark,  
4 Delaware. I am Vice President – Customer Operations for the Cavalier parent company,  
5 Cavalier Telephone, LLC, and until recently I headed up all sales and operations of our  
6 Cavalier subsidiary that serves Delaware and neighboring states, Cavalier Telephone  
7 Mid-Atlantic. I have worked in the Telecommunications industry for over 20 years  
8 domestically and abroad. I have spent my career in Customer Billing, Treasury and  
9 Financial Operations, Customer Service, Installation and Maintenance, Engineering, Call  
10 Center Management and OSS deployment.

11 **Q. What issues do you address?**

12 A. I address Issue C17 relating to Verizon's making inappropriate customer contacts.

13 **Q. Please summarize issue C17.**

14 A. The basic problem here relates to contacts between Cavalier retail customers and  
15 Verizon's retail marketing/customer contact personnel. It is inevitable that some  
16 Cavalier customers will contact Verizon if a problem develops with some aspect of their  
17 telephone service. When that occurs, it is critical that Verizon's contact personnel know  
18 to politely refer the caller to Cavalier. From the other side, so to speak, all business  
19 inquiries between Verizon, as a wholesale supplier to Cavalier, and Cavalier should be  
20 kept secret from the Verizon retail arm that Cavalier competes with. Verizon claims to  
21 have built "firewalls" between its wholesale and retail organizations to keep these  
22 matters confidential. Even so, leaks occur. Verizon retail, through some internal source

1 unbeknownst to Cavalier, can find out that Cavalier is courting a prospective customer,  
2 and is able to call on that customer prior to any sales efforts by Cavalier to stop the deal.

3 Cavalier proposes to deal with this issue by adding specific contract language that  
4 would require better training of Verizon personnel and an improved procedure for  
5 dealing with violations.

6 **Q. Why is Cavalier concerned about customer contacts and the mishandling of**  
7 **proprietary information about customers?**

8 A. Cavalier has had a number of problems with improper contacts between Verizon  
9 and its affiliates, on the one hand, and Cavalier's existing or potential customers, on the  
10 other. I will describe five different ways in which this problem has arisen, with specific  
11 examples. Some of these examples took place in neighboring states. But because  
12 Verizon sets uniform policies throughout its footprint, these occurrences could just as  
13 readily happen in Virginia.

14 First, Verizon has contacted our customers with arguably defamatory statements  
15 about Cavalier. For instance, a Cavalier customer, Costello Design, told Cavalier a  
16 Verizon sales representative had called our customer to say that Cavalier was engaged in  
17 an "illegal" practice of forcing customers to sign contracts. Of course it is legal to enter  
18 into a written service contract with a business, and to suggest Cavalier was breaking the  
19 law probably qualifies as slander.

20 Second, Verizon's wholesale organization sometimes contacts Cavalier's  
21 customers directly, providing them with information about when facilities can or cannot  
22 be deployed, if Verizon is an ultimate supplier of some or all of such facilities. As an  
23 example, Cavalier lost the lucrative sale of a DS-3 circuit to one customer in Wilmington,

1 Delaware early in March 2003, when Verizon improperly contacted the customer directly  
2 to tell the customer about a Verizon delay in making facilities available. This incident  
3 was the second time that the Cavalier agent who had made the sale had experienced such  
4 a problem.

5 Third, Yellow Pages sales representatives have contacted Cavalier customers to  
6 advise them they will no longer receive Yellow Pages advertising after switching their  
7 service to Cavalier, or will pay higher prices for Yellow Pages advertising, or will be  
8 subject to new, up-front payment requirements. For example, Mr. Al Chenault of  
9 Creative Windows in Virginia was presented with such an up-front payment request in  
10 June 2002. Similarly, in June 2003, a Cavalier customer, Autobahn Auto, specifically  
11 told Cavalier it was returning to Verizon as a "winback" because Verizon had offered  
12 Autobahn six (6) free months of Yellow Page advertising. Another related problem is the  
13 Verizon rule that our business customers cannot change the location, or heading code, of  
14 their Yellow Page listings unless they make their requests directly to Verizon. Verizon  
15 will not accept that information from Cavalier -- even when we have our customers'  
16 consent. This is yet another example of Verizon allowing itself an unchecked  
17 opportunity to deal with our customers in an improper fashion.

18 Fourth, Verizon has sent customer service records ("CSR") to the wrong  
19 destination. In September 2002, Cavalier received an almost 6,000-page CSR for an  
20 AT&T customer. Such incidents certainly raise concerns on Cavalier's part about  
21 whether Verizon is sending CSR's for Cavalier's customers to Cavalier or whether such  
22 information is easily accessible to Verizon's retail sales representatives.

1 Finally, I will mention that we have had concerns that Verizon's operational  
2 support systems might sometimes allow one carrier to access another carrier's entire  
3 customer list. As a specific example, in October 2001, Cavalier accidentally obtained  
4 what was apparently Allegiance Telecom's customer list for all of Maryland. Cavalier  
5 did not use the information for any improper purpose, and shared its concerns with  
6 Allegiance. Nonetheless, we are concerned this kind of problem could happen to  
7 Cavalier and, if it does, Verizon's retail arm would have access to our customer list.

8 **Q. What solution does Cavalier propose?**

9 A. Cavalier proposes a simple solution, consisting of (i) appropriate training and  
10 corrective measures for Verizon's personnel, to avoid situations like those described  
11 above, and (ii) liquidated damages to Cavalier for breach of Verizon's duties not to  
12 disclose confidential or proprietary information. Again, these very limited penalties  
13 should: (i) provide Verizon with an incentive not to allow unchecked problems with such  
14 information, (ii) provide some minimal degree of compensation to Cavalier to defray the  
15 costs that it incurs in such situations, and (iii) help to safeguard customer proprietary  
16 network information, an issue addressed by both the Telecommunications Act of 1996  
17 and the FCC's regulations.

18 **Q. What if new Cavalier (and ex-Verizon) customers want to call Verizon about**  
19 **their prior Verizon bill? Would Cavalier's proposal penalize Verizon in that**  
20 **situation?**

21 A. Absolutely not. Cavalier's proposal would not interfere in any way with a  
22 Cavalier customer calling Verizon about any problem he or she may have had with the  
23 ILEC. Of course, Verizon should not then take that opportunity to disparage Cavalier.



1   **Q.     Verizon has taken the position that even “flimsy” evidence of Verizon’s**  
2   **inappropriate customer contacts would suffice to trigger a Commission**  
3   **investigation. Do you agree?**

4   **A.** No, I do not. Frankly, it’s hard to conceive of a case with “flimsy” evidence of  
5   inappropriate customer contacts. There will either be no evidence or there will be  
6   evidence. One should keep in mind that these problems are generally brought to  
7   Cavalier’s attention by our customers. If a customer believes a Verizon contact was so  
8   noteworthy that it should be reported to Cavalier, that evidence is worthy of  
9   investigation. The evidence also comes from Verizon itself, as witnessed by the way it  
10   sent us AT&T’s CSR and also made the Allegiance customer list available to Cavalier.

11         We agree a bare allegation by a Cavalier employee, without more, does not  
12   amount to evidence sufficient to trigger an investigation. The reality is that our  
13   customers and Verizon are generating this evidence, not Cavalier.

14   **Q.     Verizon takes the position that Cavalier’s proposed penalty structure is**  
15   **unfair. Do you agree?**

16   **A.**    No, given the nature of this problem, I believe Cavalier’s proposed penalties are  
17   fair and reasonable. Cavalier has a right to expect its wholesale supplier to make sure its  
18   retail arm isn’t disparaging or alienating our customers. This competitor-as-supplier  
19   system is ripe for abuse absent a strong deterrent. Cavalier is not trying to make money  
20   off these penalties. We want Verizon to behave in such a manner that Cavalier will have  
21   no reason to receive a penalty payment. But a penalty is unlikely to have an effect  
22   against a large company like Verizon unless it is substantial.

1           Moreover, this type of problem is apt to evade Cavalier's review. The customer  
2   who, due to an inappropriate Verizon contact, has changed their mind about Cavalier is  
3   not likely to run to Cavalier to report the contact. The customer may believe they will  
4   benefit from the Verizon inducement only if they 'keep it close to the vest'. In such  
5   cases, it is unlikely Cavalier would ever learn the reason for the improper winback. We  
6   therefore need a strong deterrent in place to nip in the bud any cost-benefit analysis of  
7   engaging in inappropriate customer contacts.

8   **Q.     Does this complete your testimony?**

9   **A.     Yes.**

1                                   **Declaration of Mark S. Zitz**

2

3           I declare under penalty of perjury that I have reviewed the foregoing testimony and that  
4 those sections as to which I testified are true and correct to the best of my knowledge.

5

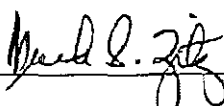
6 Executed this 22nd day of September, 2003.

7

8

9

10

  
Mark S. Zitz

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Petition of Cavalier Telephone, LLC	)	WC Docket No. 02-359
Pursuant to Section 252(e)(5) of the	)	
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of the Jurisdiction of the Virginia State	)	
Corporation Commission Regarding	)	
Interconnection Disputes with Verizon	)	
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**TESTIMONY OF TODD HILDER  
ON BEHALF OF CAVALIER TELEPHONE, LLC**

**CAVALIER EXHIBIT \_\_\_\_**

September 23, 2003

1 **Q. Please state your name and job responsibilities.**

2 **A.** My name is Todd Hilder. I am a Cavalier Assignment Clerk responsible for  
3 directory listing changes and issues. In this position, I am responsible for the handling of  
4 directory listing change requests and internal and external correspondence relating to  
5 directory listing issues.

6 **Q. Are you familiar with Cavalier's experience relating to Directory listings for**  
7 **customers?**

8 **A.** Yes. I have been involved in the process since April of 2001.

9 **Q. Are you familiar with any problems Cavalier may have had with its**  
10 **customers' Directory listings?**

11 **A.** Yes, I am. Cavalier has had a significant history of problems with its customers'  
12 directory listings. We have come from what was a error-prone system, with upwards of  
13 seven thousand pre-production errors before a single directory release, to a more reliable  
14 system, but in spite of system improvements, both pre-production and post-production  
15 errors continue to occur. *Most of the errors I find are the result of manual or systematic*  
16 *errors that occur after Cavalier has handed off the listing details to Verizon. We have*  
17 *discovered that there are multiple points within Verizon's directory listing process where*  
18 *errors can occur.*

19 **Q. Does Cavalier publish its own Directory for its customers?**

20 **A.** No. Cavalier relies upon Verizon to publish the white page and yellow page  
21 Directory listings for our customers.

22 **Q. What problems, if any, have Cavalier and your customers had with the**  
23 **Directory listings?**

1 A. We have a long history of problems. The problems generally stem from a  
2 fundamental flaw in the directory listing process, with Cavalier not having direct control  
3 over the listings that reside in the Verizon directory database. Instead, it must go through  
4 a complex process of inputting directory listings into a companion system, whereupon  
5 Verizon then downloads and reenters the listing information into the database. Even  
6 though Cavalier may input flawless data, Verizon in effect reinputs the data. But Verizon  
7 places the responsibility of verifying *Verizon's own inputs* upon Cavalier. That is,  
8 Cavalier is held accountable for verifying Verizon's own work, and fixing the mistakes  
9 that *Verizon* makes in *Verizon's* own internal processes. For example, in reviewing the  
10 Richmond LVR in 2002, we uncovered 1,187 errors on the LVR. For the 2003 South  
11 Hampton Roads directory, we uncovered 540 LVR errors. LVR pre-production errors are  
12 at a level of about 2% of our total listings. At times the situation has been so dire that  
13 Cavalier has had to dedicate a staff of six full time employees just to check and to verify  
14 the Verizon inputs that are Verizon's responsibility. That's an altogether wasteful use of  
15 our scarce staffing resources. Cavalier should not have to maintain a staff to make sure  
16 that Cavalier's accurate inputs remain so after Verizon touches them.

17 **Q. Is a business's erroneous listing in the white or yellow pages a serious**  
18 **consequence?**

19 A. Of course. In my experience, most businesses consider reliable customer  
20 telephone access to be absolutely critical. Most businesses count on people being able to  
21 reach them, through accurate directory listings.

22 **Q. And in your experience Cavalier has to verify and implement corrective**  
23 **action for Verizon errors?**

1    **A.**     Yes. Unfortunately, we have to investigate listings to verify Verizon errors. At  
2    that point, we can fix Verizon's errors or submit the errors to Verizon via a spreadsheet  
3    for further investigation and correction of the errors.

4    **Q.**     **Please explain.**

5    **A.**     The listing process begins with Cavalier's submission of a Local Service Request  
6    (LSR) to Verizon. Once this LSR has been submitted from Cavalier to Verizon, the  
7    processing of the listing request is in Verizon's hands.

8         The process continues with Verizon's issuance to Cavalier of a Local Service  
9    Confirmation and Billing Completion Notification ("Confirmation"). This Confirmation  
10   shows the details of Verizon's own internal system if the listing is a typical "straightline"  
11   white pages listing. But if instead the request involves "caption style" listings, Verizon's  
12   Confirmation provides no verification of any listing activity taking place. Although the  
13   listing activity shown on these Confirmations are the result of manual or systematic  
14   activity taking place within Verizon, Cavalier has in the past taken the time to review  
15   them to ensure that Verizon is processing their service orders correctly. If there was an  
16   error on the Confirmation, Cavalier would notify Verizon of this (Verizon's) error.

17        Further, even after Cavalier has received and reviewed the Confirmation for accuracy,  
18   there is no guarantee the listing will print correctly in the directory. Therefore, Verizon  
19   has placed the burden on CLECs such as Cavalier to use an enormous amount of time and  
20   resources to continue to research, and investigate potential Verizon errors at a point  
21   further downstream. Verizon provides CLECs a Listing Verification Report (LVR) as  
22   generated by Verizon's "VIS" organization. Thus, dedicated staffs such as Cavalier's,

1 expending an enormous amount of time and resources to find these errors, have been a  
2 great asset to Verizon. We research, locate and report Verizon's errors to Verizon.

3 **Q. Why would Cavalier use its time and resources to conduct this research?**

4 **A.** The situation leaves Cavalier between the rock of relying upon Verizon not to  
5 muck up Cavalier's accurate directory information and the hard place of a labor-intensive  
6 review of the LVR to keep our customers from broad-scale dissatisfaction and defection.  
7 Experience has shown that the vast majority of Directory process errors occur after  
8 Cavalier has submitted its LSR to Verizon and placed the listings in Verizon's hands.  
9 Had we not dedicated a staff to checking Verizon's tracks for the last couple of years, the  
10 Richmond and Hampton Roads directories would have been published with close to ten  
11 thousand Verizon errors to our listings.

12 Our customers are at risk. If we hadn't taken the time to do this work, we would be  
13 placing our customers, as well as our business, at risk. We have had customers leave  
14 Cavalier in favor of Verizon or other providers because of Directory errors even though  
15 the error was no fault of Cavalier's.

16 **Q. Does Verizon do any verification on its own that the Cavalier listings make**  
17 **their way to the LVR?**

18 **A.** Verizon does have a process in place to review previous Cavalier submissions.  
19 Unfortunately, this process fails to catch a number of the errors, and does not actually  
20 focus on the LVR. It is Cavalier's responsibility to obtain Directory information from its  
21 customers, and to input that information correctly into the Verizon OSS system. Cavalier  
22 receives a Confirmation from Verizon that the order was accepted. To Cavalier at this  
23 point, its work should be done. But, according to Verizon, it is required to check the



1 LVR, as a double check on Verizon's own work. And, when Cavalier later gets the LVR,  
2 and the listing either does not show up or has an inaccuracy, unless Cavalier fixes or  
3 notifies Verizon of the Verizon mistake, there's a significant risk the book will be  
4 published with that error.

5 **Q. What does this do to your operations?**

6 **A.** You have to recognize that the closing of a Directory is a nightmare to a small  
7 start-up company like Cavalier, which relies so heavily on its customer relations and with  
8 close to 200,000 listed customers, many with multiple lines. For residential customers,  
9 we have had to check the Verizon LVR to see whether Cavalier's listings have properly  
10 flowed through to the white page listings. In the verification process, we have often  
11 discovered our customers' listings, which were initially submitted and confirmed by  
12 Verizon, did not make it in to the Directory database or were installed inaccurately. So  
13 then Cavalier must either (1) reenter the listing information, (2) change the listing  
14 information so that the error is corrected, or (3) research the order that Cavalier correctly  
15 sent to identify the error and notify Verizon via spreadsheet so that Verizon can make the  
16 correction themselves in their data base. So when the OSS process fails – like it did in  
17 the past and may very well continue to do— Cavalier can be literally left chasing  
18 hundreds or even thousands of last minute corrections, and then scurrying with Verizon at  
19 the last minute to have these listings corrected.

20 **Q. If a Cavalier customer's listing appears correctly in either the white pages or**  
21 **the yellow pages, will it appear correctly in the other as well?**

22 **A.** No, not necessarily. Cavalier gets a report of what is supposed to be published in  
23 the white pages, but there is *no verification report whatsoever to show what's supposed*